

IN THE CIRCUIT COURT OF 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

TAMMY WILLIAMS,

Plaintiff,

vs.

DOLGENCORP, LLC d/b/a DOLLAR GENERAL

Defendant.

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED TO serve this summons and a copy of the Complaint in the above styled case upon Defendant:

Defendant: DOLGENCORP, LLC d/b/a DOLLAR GENERAL

Registered Agent: CORPORATION SERVICE COMPANY

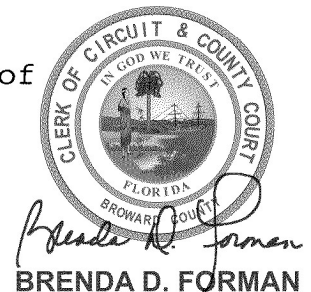
Address: 1201 HAYS STREET
TALLAHASSEE, FL 32301

Defendant is required to serve written defenses to the complaint or petition on Plaintiff's attorney, to wit: EVAN R. KRAKOWER, ESQUIRE, Attorney for Plaintiff, 10061 NW 1 Court, Plantation, FL 33324 (954) 474-4244, E-Service: EvanRKrakowerPA@yahoo.com within (20) days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of this Court either before service on Plaintiff's attorney or immediately thereafter. If the Defendant fails to do so, a default will be entered against that Defendant for the relief demanded in the complaint.

DATED this MAY 11 2022, 2022.

BRENDA FORMAN as Clerk of
said Court
BY:

as Deputy Clerk
(Court Seal)



IN THE CIRCUIT COURT OF 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

TAMMY WILLIAMS,

Plaintiff,

vs.

DOLGEN CORP, LLC d/b/a DOLLAR GENERAL

Defendant.

_____ /

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, TAMMY WILLIAMS, by and through her undersigned attorney and sues the Defendant, and allege as follows:

- 1) This is an action for damages in excess of \$30,000.00.
- 2) At all times material hereto, Plaintiff, TAMMY WILLIAMS is a resident and citizen of Broward County, Florida, and is over the age of eighteen (18) years, and is otherwise sui juris.
- 3) At all times material hereto, Defendant, DOLGEN CORP, LLC d/b/a DOLLAR GENERAL . is a corporation, duly authorized to do and doing business in the State of Florida.
- 4) At all times material hereto, Defendant, DOLGEN CORP, LLC d/b/a DOLLAR GENERAL owned, controlled, possessed, and maintained the property located at 2300 W. Atlantic Blvd., Pompano Beach, FL 33069.

5) At all times material hereto, Plaintiff, TAMMY WILLIAMS, was rightfully on the premises as an invitee.

6) On or about the 26th day of January, 2019, the Plaintiff, TAMMY WILLIAMS was at the DOLGEN CORP, LLC d/b/a DOLLAR GENERAL located at the above address. At said time and place, the Defendant, DOLGEN CORP, LLC d/b/a DOLLAR GENERAL . owed to the general public and to the Plaintiff, TAMMY WILLIAMS, in particular, the duty of keeping its premises in a reasonably safe condition so that persons such as Plaintiff, TAMMY WILLIAMS, would not be injured on said premises.

7) The Defendant, DOLGEN CORP, LLC d/b/a DOLLAR GENERAL breached its duty to the Plaintiff in the that the Defendant, its employees, servants or agents, while acting in the course and scope of their employment, created and/or allowed to be created a dangerous and defective condition, to wit; improperly stored stock crates, which caused the Plaintiff, TAMMY WILLIAMS, to trip and fall, thereby injuring herself.

8) The Defendant, DOLGEN CORP, LLC d/b/a DOLLAR GENERAL knew or should have known of said dangerous and defective condition; and failed to warn the general public, or the Plaintiff, TAMMY WILLIAMS, in particular, of any danger or, in the alternative, the Defendant allowed said dangerous and defective condition to exist for a length of time sufficient in which a reasonable inspection would have disclosed such condition.

9) As a direct and proximate result of the aforesaid negligence of Defendant, DOLGEN CORP, LLC d/b/a DOLLAR GENERAL Plaintiff, TAMMY WILLIAMS, was injured in and about **her** body and extremities, suffered pain and mental anguish therefrom, was required to and did receive medical care, treatment, and related expenses as a result of **her** injuries, suffered great pain and will continue permanently to suffer great pain, and has suffered and sustained permanent injury within a reasonable degree of medical probability and/or aggravated a pre-existing injury or condition thereto; and said injuries are either permanent or continuing in their nature, that **her** working ability was impaired and **she** suffered a resultant loss of earnings, and will suffer such losses and impairments in the future, as well as conditions not yet diagnosed; that all of said injuries were caused solely by the negligence and carelessness of the Defendant herein.

WHEREFORE, Plaintiff demands judgment for compensatory damages, costs against the Defendant and a trial by jury of all issues triable in this cause.

DATED this _____ day of _____, 2022.

EVAN R. KRAKOWER, P.A.
Attorneys for the Plaintiff
10061 NW 1 Court
Plantation, FL 33324
PHONE: (954) 474-4244
FAX: (954) 474-4245
E-service: EvanRKrakowerPA@yahoo.com

By: /s/ Evan R. Krakower
EVAN R. KRAKOWER, ESQ
FL BAR NO: 312894

By: /s/ David A. Tabb
DAVID A. TABB, ESQ
FL BAR NO: 67385

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

Tammy Williams
Plaintiff

Case # _____
Judge _____

vs.

Dolgencorp, LLC d/b/a Dollar General
Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less
- ☐ \$8,001 - \$30,000
- ☐ \$30,001- \$50,000
- ☒ \$50,001- \$75,000
- ☐ \$75,001 - \$100,000
- ☐ over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- ☐ Condominium
- ☐ Contracts and indebtedness
- ☐ Eminent domain
- ☐ Auto negligence
- ☒ Negligence—other
 - ☐ Business governance
 - ☐ Business torts
 - ☐ Environmental/Toxic tort
 - ☐ Third party indemnification
 - ☐ Construction defect
 - ☐ Mass tort
 - ☐ Negligent security
 - ☐ Nursing home negligence
 - ☒ Premises liability—commercial
 - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
 - ☐ Commercial foreclosure
 - ☐ Homestead residential foreclosure
 - ☐ Non-homestead residential foreclosure
 - ☐ Other real property actions
- ☐ Professional malpractice
 - ☐ Malpractice—business
 - ☐ Malpractice—medical
 - ☐ Malpractice—other professional
- ☐ Other
 - ☐ Antitrust/Trade regulation
 - ☐ Business transactions
 - ☐ Constitutional challenge—statute or ordinance
 - ☐ Constitutional challenge—proposed amendment
 - ☐ Corporate trusts
 - ☐ Discrimination—employment or other
 - ☐ Insurance claims
 - ☐ Intellectual property
 - ☐ Libel/Slander
 - ☐ Shareholder derivative action
 - ☐ Securities litigation
 - ☐ Trade secrets
 - ☐ Trust litigation

COUNTY CIVIL

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure

- ☐ Replevins
- ☐ Evictions
 - ☐ Residential Evictions
 - ☐ Non-residential Evictions
- ☐ Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

IV. REMEDIES SOUGHT (check all that apply):

- ☒ Monetary;
- ☐ Nonmonetary declaratory or injunctive relief;
- ☐ Punitive

V. NUMBER OF CAUSES OF ACTION: []
(Specify)

1

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☐ yes
- ☒ no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ no
- ☐ yes If "yes," list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ yes
- ☐ no

IX. DOES THIS CASE INVOLVE ALLEGATIONS OF SEXUAL ABUSE?

- ☐ yes
- ☒ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Evan R Krakower
Attorney or party

Fla. Bar # 312894
(Bar # if attorney)

Evan R Krakower
(type or print name)

05/10/2022
Date

IN THE CIRCUIT COURT OF 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER: CACE-22-006759

TAMMY WILLIAMS,

Plaintiff,

vs.

DOLGENCORP, LLC d/b/a DOLLAR GENERAL

Defendant.

AMENDED COMPLAINT FOR DAMAGES
(as to location and date of incident only)

COMES NOW the Plaintiff, TAMMY WILLIAMS, by and through her undersigned attorney and sues the Defendant, and allege as follows:

- 1) This is an action for damages in excess of \$30,000.00.
- 2) At all times material hereto, Plaintiff, TAMMY WILLIAMS is a resident and citizen of Broward County, Florida, and is over the age of eighteen (18) years, and is otherwise sui juris.
- 3) At all times material hereto, Defendant, DOLGENCORP, LLC d/b/a DOLLAR GENERAL is a corporation, duly authorized to do and doing business in the State of Florida.
- 4) At all times material hereto, Defendant, DOLGENCORP, LLC d/b/a DOLLAR GENERAL owned, controlled, possessed, and maintained the property located at Dollar General, 1000 Powerline Road, Pompano Beach, FL 33069.

5) At all times material hereto, Plaintiff, TAMMY WILLIAMS, was rightfully on the premises as an invitee.

6) On or about the 6th day of April, 2021, the Plaintiff, TAMMY WILLIAMS was at the DOLGENCORP, LLC d/b/a DOLLAR GENERAL located at the above address. At said time and place, the Defendant, DOLGENCORP, LLC d/b/a DOLLAR GENERAL . owed to the general public and to the Plaintiff, TAMMY WILLIAMS, in particular, the duty of keeping its premises in a reasonably safe condition so that persons such as Plaintiff, TAMMY WILLIAMS, would not be injured on said premises.

7) The Defendant, DOLGENCORP, LLC d/b/a DOLLAR GENERAL breached its duty to the Plaintiff in the that the Defendant, its employees, servants or agents, while acting in the course and scope of their employment, created and/or allowed to be created a dangerous and defective condition, to wit; improperly stored stock crates, which caused the Plaintiff, TAMMY WILLIAMS, to trip and fall, thereby injuring herself.

8) The Defendant, DOLGENCORP, LLC d/b/a DOLLAR GENERAL knew or should have known of said dangerous and defective condition; and failed to warn the general public, or the Plaintiff, TAMMY WILLIAMS, in particular, of any danger or, in the alternative, the Defendant allowed said dangerous and defective condition to exist for a length of time sufficient in which a reasonable inspection would have disclosed such condition.

9) As a direct and proximate result of the aforesaid negligence of Defendant, DOLGENCORP, LLC d/b/a DOLLAR GENERAL Plaintiff, TAMMY WILLIAMS, was injured in and about **her** body and extremities, suffered pain and mental anguish therefrom, was required to and did receive medical care, treatment, and related expenses as a result of **her** injuries, suffered great pain and will continue permanently to suffer great pain, and has suffered and sustained permanent injury within a reasonable degree of medical probability and/or aggravated a pre-existing injury or condition thereto; and said injuries are either permanent or continuing in their nature, that **her** working ability was impaired and **she** suffered a resultant loss of earnings, and will suffer such losses and impairments in the future, as well as conditions not yet diagnosed; that all of said injuries were caused solely by the negligence and carelessness of the Defendant herein.

WHEREFORE, Plaintiff demands judgment for compensatory damages, costs against the Defendant and a trial by jury of all issues triable in this cause.

DATED this 23 day of May, 2022.

EVAN R. KRAKOWER, P.A.
Attorneys for the Plaintiff
10061 NW 1 Court
Plantation, FL 33324
PHONE: (954) 474-4244
FAX: (954) 474-4245
E-service: EvanRKrakowerPA@yahoo.com

By: /s/ Evan R. Krakower
EVAN R. KRAKOWER, ESQ
FL BAR NO: 312894

By: /s/ David A. Tabb
DAVID A. TABB, ESQ
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